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MGM

McCullough Ginsberg Montano & Partners

A Limited Liability Partnership Formed in the State of New York

Partners

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MEMO ENDORSED

Of Counsel Jason Liam Schm

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February 8, 2019

Hearing

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11:00 4.

VIA ECF

Hon. Paul E. Davison United States Magistrate Judge United States Courthouse 300 Quarropas Street, Courtroom 420 White Plains, NY 10601

Re:

William Gunnar Truitt v. Salisbury Bank and Trust Company

Index No. 7:18-cv-08386-NSR-PED

Dear Judge Davison:

Hon. Faul E. Davison
United States Magistrate Judge

We completed an uninterrupted 45-minute meet and confer with counsel for Defendants on February 4, 2019 and discussed every discovery request raised in our February 5, 2019 letter to Your Honor during that call. We also discussed every proposed limitation to Interrogatory No. 10 that Defendants recited in their February 5 letter to Your Honor during that call. Although we remain willing to meet and confer with Defendants regarding any request before the hearing, our requests regarding Interrogatory Nos. 1, 3, 10, 14, 15, and 16 are still outstanding. Finally, if Your Honor would permit me to attend the February 15, 2019 hearing telephonically, it would be greatly appreciated (allowing me to preserve a plan to visit family in Colorado).

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Sincerely,

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Counsel for Plaintiff

ce: Ted McCullough and Jim Coughlan (counsel for Mr. Truitt) Lindsay M. Sorin and Amber M. Spataro (counsel for Defendants)